

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
ALICIA A. MCCALLA,

Plaintiff(s),

- against -

MS TRUCKING INC., DAVID JACKSON,

Defendants(s).  
-----X

Docket No.: 1:16-cv-02470-ILG-  
RML

**RULE 26 DISCLOSURES  
DEFENDANT'S EXPERT  
EXCHANGE**

**PLEASE TAKE NOTICE**, that the following are the Rule 26(a)(2) of the Defendants, MS Trucking, Inc. and David Jackson, by its attorneys, SHAFER GLAZER, LLP, to Plaintiffs Demand for Interrogatories, upon information and belief, for the purposes of this action only and subject to all objections at trial:

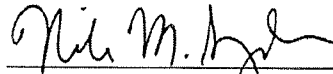
1. **EXPERT:** Paul Kuflik, M.D. A copy of his report is annexed hereto as **Exhibit "A"**.
2. A copy of his Dr. Kuflik, M.D's., Curriculum Vitae is annexed hereto as **Exhibit "B"**.
3. A copy of the list of earlier cases in which, Dr. Kuflik has testified in trials or depositions is annexed hereto as **Exhibit "C"**.

Dr. Kuflik charges \$7,500 prepaid for an Independent medical examination or \$2,500 payable in advance and subsequently \$500 an hour. Dr. Kuflik charges \$15,000 for a full day for court testimony and \$500 an hour for record review and \$500 an hour for discussion.

**PLEASE TAKE FURTHER NOTICE** that the Defendants, MS Trucking, Inc. and David Jackson, by its attorneys, SHAFER GLAZER, LLP reserves the right to supplement and/or amend this response should additional information become available

Dated: New York, NY  
April 10, 2017

*Yours, etc.,*



NICOLE M. SNYDER (NS0228)

SHAFFER GLAZER, LLP

Attorneys for Defendants

MS Trucking, Inc. and David Jackson

125 Maiden Lane, 16<sup>th</sup> Floor

New York, New York 10038-3202

(212) 267-0011

Our File: 229-00205

**TO:**

WILLIAM SCHWITZER & ASSOCIATES, P.C.

Attorneys for Plaintiff

ALICIA A. MCCALLA

820 2nd Avenue, 10th Floor

New York, New York 10017

(212) 685-7800

File No. SMI16-003

# EXHIBIT A



Paul L. Kuflik, MD  
Associate Professor  
Orthopaedic Spine Surgery

*Mailing and Office Address*  
Icahn School of Medicine at Mount Sinai  
5 East 98<sup>th</sup> Street, 4<sup>th</sup> Floor, Box 1188  
New York, NY 10029-6574  
T 212-241-1072  
F 646-537-9449

March 13, 2017

Nicole M. Snyder, Esq.  
Shafer Glazer LLP  
125 Maiden Lane, 16<sup>th</sup> floor  
New York, New York 10038

**Re: Alicia A. McCalla**  
Index #16-CV-02470  
Date of Injury: 08/04/2014

Dear Ms. Snyder:

I had the opportunity to perform an independent medical examination on Ms. McCalla with regard to the spine on March 13, 2017 at approximately 10:15 AM. Ms. McCalla arrived more than an hour late for her appointment. Ms. McCalla's identification was confirmed using her NYS driver's license. Ms. Toika Rivers a representative of Ms. McCalla's law firm was present throughout. A female medical assistant was present for the examination.

The history as obtained from Ms. McCalla is that she is a 44-year-old right hand dominant woman who was the driver of a van. She was stopped and hit in the back of her vehicle on August 4, 2014. She was wearing a seatbelt. There was no loss of consciousness. There was no air bag deployment. She was six months pregnant at the time. She was taken by ambulance to Jamaica Hospital where she claims she remained for 24 hours and was discharged. Approximately a week later she sought medical attention. She does not recall whom she saw at that time. She remembers treating with two doctors, Dr. Reyfman and Dr. Lerman, one was the pain management doctor and one was the surgeon. She claims she had pain after the accident in her neck that radiated to the left shoulder with associated left upper extremity discomfort that she rates as a 10 on a scale of 0 to 10. She underwent neck surgery on March 31, 2015. She claims that surgery was not of much help to her. She received physical therapy briefly after the surgery, and now continues to see her pain management doctor, Dr. Reyfman on a monthly basis. He gives her medications but she does not know what those medications are. She has complaints of pain in her lower back in the midline. The pain does not significantly radiate. She rates the back pain as an 8 to 9 on a scale of 0 to 10. She denies problems with her spine prior to this event. Her pains are aggravated with walking or sitting, it feels better if she lies down. She does not know how long she can sit for comfortably, she thinks she can stand comfortably for about 30

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minutes and walk two blocks. She recalls receiving physical therapy and epidural injections in her neck and her lower back prior to the surgery.

She completed her pregnancy uneventfully. She takes medications on a daily basis, but does not know the names or how frequently she takes them. She denies allergies to medications. She does not smoke, she does not consume alcohol. She is able to perform her activities of daily living. She is able to drive. She is working full time as a home health attendant.

Ms. McCalla was instructed before the examination and during the examination to report any pain and to avoid performing any maneuvers that she felt could worsen her symptoms or condition. She indicated that she understood this. Opportunities for breaks during the examination were offered. The examination was completed without complaints or signs of injury.

On examination now she is a pleasant, cooperative woman in no apparent distress. She independently changed into a gown for the examination. She is able to move about the exam room without difficulty and get up and down from the exam table unassisted. She is 5'3" tall and weighs 225 pounds. BMI=39.9 obese. She has a normal gait. She would not attempt to demonstrate toe walking. She attempted to demonstrate heel walking but claimed she was unable to, and was able to perform tandem gait. There is no evidence of para spinal muscle spasm. She complains of pain throughout the back and neck in response to light palpation. On active range of motion testing of the lumbar spine she demonstrated 30 degrees of lumbar flexion, 0 degrees of extension, and claims she was unable to demonstrate side bending or rotation as it aggravated her neck pain. On active range of motion testing of the cervical spine she would not demonstrate flexion, she would not demonstrate extension. She demonstrated 5 degrees of right and left lateral bending and 5 degrees of right and left rotation. Motion is restricted by subjective complaints of pain. A goniometer is used to assist in measurement.

Normal range of motion lumbar spine:

Flexion 75-90 degrees  
Extension 25-30 degrees  
Lateral right bending 30 degrees  
Lateral left bending 30 degrees  
Rotation to the right 30 degrees

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Rotation to the left 30 degrees

Normal range of motion of the cervical spine:

Flexion 45-60 degrees

Extension 45-60 degrees

Lateral bending to the right 40-45 degrees

Lateral bending to the left 40-45 degrees

Lateral rotation to the right 70-90 degrees

Lateral rotation to the left 70-90 degrees

Motor examination of the upper extremities reveals her motor strength to be 4/5 in all the muscle groups of both upper extremities. There was not much effort on testing and she gave way repeatedly. Motor examination of the lower extremities is 5/5. There is no evidence of clonus, Hoffmann's, or Babinski signs. Straight leg raising is negative bilaterally. Deep tendon reflexes are 1 plus in the upper extremities, 1 plus in the lower extremities. She had decreased sensation in a global distribution below the knee on the right side, and she claims that sensation to light touch of her left upper extremity was "rough", and in her right upper extremity was "soft". She has a well healed 5 cm transverse incision in the base of the neck on the right side. The incision is slightly hypertrophic. There is no atrophy of the extremities noted.

I reviewed the following records:

1. Medical records Metropolitan Medical & Surgical PC
2. Medical records Stand-Up MRI of Lynbrook;
  - a. Report MRI of the cervical spine 11/26/2014. The report indicates a posterior disc herniation in midline with a right para median focal extrusion at C4-C5.
  - b. Report MRI of the lumbar spine 11/30/2014. There is a broad based posterior disc herniation impressing on the thecal sac and L5 roots. At the superior margin of the L4-L5 facet there is a 1.2 x .9 x 0.7 cm synovial cyst extending into the right posterior para spinal soft tissues not causing neural compromise. There were disc bulges at L1-L2, L2-L3 and L3-L4 with reactive changes in the end plates at T10-T11.
3. Medical records Leon Reyfman.
4. Medical records John Shiau.

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5. Medical records Community Medical Imaging, report x-rays of the cervical spine 04/01/2015. Reversal of the curvature of the spine consistent with muscle spasm.
6. Medical records Nassau University Medical Center including operative report 03/31/2016, surgeon Dr. Vadim Lerman, assistant Dr. Karen Avanesov. Preoperative diagnosis intractable neck pain, C4-C5 disc herniation with cervical radiculopathy left upper extremity. The post operative diagnosis was the same. The operation was an anterior cervical discectomy C5-C6, intravertebral implant C5-C6, arthrodesis C5-C6, anterior instrumentation C5-C6, allograft and autograft, application of cranial tongs. The findings were C4-C5 disc herniation with annular tear and soft herniated disc fragments causing canal stenosis with resulting in C5 nerve root compression. The operative report describes a standard anterior cervical discectomy and fusion at the C4-C5 level.
7. Medical records Dr. Vadim Lerman, DO.
8. Plaintiff's interrogatories to defendant.
9. Medical records Mark Gladstein, M.D.
10. Medical records Eldar Kadymoff, medical PC
11. Records Country Wide Insurance Company.
12. Police accident report 08/04/2014. Vehicle 1 (Ms. McCalla) claims she was sideswiped while traveling west bound on North Conduit Avenue.
13. Medical records Jamaica Hospital Emergency Facility, date of service 08/04/2014. It notes that Ms. McCalla was wearing a lap shoulder belt. She had no complaints of back pain at the time. She was complaining of neck pain and was 25 weeks pregnant. She was neurologically intact.
14. Medical records Life Style Rehab Physical Therapy.
15. Medical records Harvey Fishman, M.D; independent medical examination 11/20/2014. Dr. Fishman found normal motion of the cervical spine, normal motion of the lumbar spine and Ms. McCalla to be neurologically intact. He found that there was no residual disability either from her occupation or activities of daily living.
16. Medical records Dr. Robert A. Richman, chiropractor; independent medical examination 11/20/2014. He essentially found subjective complaints without spinal related objective findings with no objective indication as to why she is incapable of work or performing routine activities of daily living.

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17. Medical records Wave Diagnostic Medical PC, EMG 12/18/2014 of the upper extremities. There was no evidence of cervical radiculopathy. There was evidence of carpal tunnel syndrome unrelated to the claimant's cervical spine.

I reviewed the following imaging studies:

1. MRI of the cervical spine, 11/26/14. Stand-Up MRI of Lynbrook. The study demonstrates mild chronic degenerative changes. There is a small central right sided disc herniation at C4-C5. It abuts the spinal cord but does not cause any spinal cord or nerve root compression. There is no left sided pathology consistent with Ms. McCalla's complaints. The disc herniation is more likely than not an incidental finding. It is unrelated to the event on 8/4/2014.
2. MRI of the lumbar spine, 11/26/14. Stand-Up MRI of Lynbrook. There are minimal pre-existing degenerative changes with bulging of the disc at L4-L5. No significant nerve root or thecal sac compression. No evidence of acute injury.

In summary, Ms. McCalla was involved in a motor vehicle accident on August 4, 2014 where she was side swiped. Imaging studies done shortly thereafter revealed a small right sided disc herniation at C4-C5. Ms. McCalla had left sided cervical complaints. Those complaints are not consistent with the MRI demonstrating a small right-sided disc herniation. The disc herniation noted is more likely than not an incidental finding unrelated to the motor vehicle accident. Asymptomatic disc herniations on MRI's are quite common.

The lumbar spine MRI demonstrated minimal chronic pre-existing degenerative changes without evidence of acute injury.

The spine surgery performed, (which was presumably performed at the C4-C5 level even though the operative headings says C5-C6), was not causally related to the motor vehicle accident. The findings of a minimal central right-sided disc herniation with no nerve root or cord compression in the presence of left sided complaints, indicates the disc herniation is an incidental finding. The surgery was not causally related to the motor vehicle accident.

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*Mailing and Office Address*  
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Currently Ms. McCalla has subjective findings on examination out of proportion to and inconsistent with the objective information available. There is no objective explanation for the marked diminution of motion that she demonstrates on examination. She has evidence of symptom amplification. She has complaints of functional disability out of proportion to the objective information available. A single level anterior cervical discectomy and fusion is a procedure with a reproducible patient satisfaction rate in excess of 90 - 95%. Patients typically return to unrestricted activity within one to three months, six months at the outside.

There is no causally related objective evidence of disability with regard to the spine. There is no causally related indication for the surgery that was performed. There is no causally related indication for further treatment at this time. There is no contra indication to Ms. McCalla participating in activities without restriction.

I, Paul Kuflik MD., being a Diplomate of the American Board of Orthopedic Surgeons, am duly licensed to practice medicine in the State of New York pursuant to CPLR, section 210.6 and hereby affirm under the penalties of perjury the foregoing is true to the best of my knowledge except as to those matters stated on information and belief, and as to those matters I believe to be true.

The above claimant was examined according to the restrictive rules concerning an independent medical examination. It is therefore understood no doctor patient relationship exists or is implied by this examination.

The claimant is examined in reference to that specific complaint emanating from the original injury. Any other medical conditions which were either unreported or felt to be unrelated to the original injury are considered to be beyond the purview of this examination.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Paul Kuflik".

Paul Kuflik MD  
Spine Surgery  
Associate Professor of Orthopedic Surgery  
Mount Sinai Hospital and School of Medicine  
5 East 98th Street, Fourth floor  
New York NY 10029  
Phone 212 241 1072  
Fax 646 537 9449  
paul.kuflik@mountsinai.org

**Re: Alicia A. McCalla**  
Index #16-CV-02470  
Date of Injury: 08/04/2014

## **EXHIBIT B**

09/02/2005 12:04 2128448697

PAUL KUFLIK MD

PAGE 06

## **CURRICULUM VITAE**

**Paul Larry Kuflik, M.D.**

**Home Address:**

912 Harvard Court  
Woodmere, NY 11598  
(516)569-7289

**Business Address:**

10 Union Square East  
New York, NY 10003  
(212) 844 8688

**Place of Birth:**

New York, NY

**Education:**

9/73-6/77

B.A. in Psychology  
Queens College  
City University of New York  
New York, NY

9/77-6/81

M.D.  
Upstate Medical College  
State University of New York  
Syracuse, NY

***Postdoctoral Training:***

7/81-6/82

Intern: General Surgery  
Beth Israel Medical Center  
New York, NY

7/82-6/86

Resident: Orthopaedic Surgery  
Hospital for Joint Diseases Orthopaedic Institute  
New York, NY

7/86-12/86

Fellow: Spine Surgery  
Toronto General Hospital  
Toronto, Ontario

***Licensure and Certification:***

1982

New York State

7/89

Diplomat-American Board of Orthopaedic Surgery

1992

Florida

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PALL KUFLIK MD

PAGE 07

**Paul Larry Kuflik, M.D.****Page 2****Academic Appointments and Positions:**

|               |  |
|---------------|--|
| 9/83-8/86     | Clinical Coordinator: Hip Prosthesis<br>Hospital for Joint Diseases Orthopaedic Institute<br>New York, NY                                  |
| 1/86-6/86     | Instructor in Surgery<br>Physician Assistant Program<br>Touro College Orthopaedic<br>New York, NY  |
| 7/90-Present  | Attending Surgeon<br>Putnam Hospital Center<br>Carmel, NY  |
| 1/87-12/96    | Assistant Clinical Professor of Orthopaedic Surgery<br>Mount Sinai Medical Center  |
| 1-93-12/96    | Chief Scoliosis Service<br>Hospital for Joint Diseases Orthopaedic Institute<br>New York, NY   |
| 9/1/94-12/96  | Clinical Assistant Professor of Orthopaedic Surgery<br>New York University Medical Center, New York.                                       |
| 3/95-12/96    | Section Editor for <u>Spine</u> for the Editorial Board of<br>the <u>Bulletin for Hospital for Joint Diseases</u><br>Orthopaedic Institute |
| 5/19/95       | Moderator for the spine section for the Alumni<br>Scientific Meeting, Hospital for Joint Diseases  |
| 12/96-Present | Associate Director, New York Spine Institute   |
| 7/98- Present | Assistant Clinical Professor of Orthopaedic Surgery<br>Albert Einstein College of Medicine   |

**Hospital Appointments:**

|              |   |
|--------------|---|
| 1/87-12/96   | Assistant Attending:<br>Hospital for Joint Diseases Orthopaedic Institute<br>New York, NY |
| 7/87-Present | Dept. of Orthopaedic Surgery<br>Booth Memorial Medical Center<br>Queens, NY               |
| 7/90-Present | Attending Surgeon<br>Putnam Hospital Center<br>Carmel, NY                                 |

09/02/2005 12:04 2129448697

PALL KUFLIK MD

PAGE 08

**Paul Larry Kuflik, M.D.**

**Page 3**

***Hospital Appointments, Continued***

3/19/87-Present  
Beth Israel Medical Center  
East 18th Street and First Avenue  
New York, NY 10003

***Honors and Awards:***

1977  
Awarded B.A. degree Magna cum Laude  
  
1980  
Elected to Alpha Omega Alpha  
  
7/86-12/86  
Albert Betcher Traveling Fellowship  
Hospital for Joint Diseases Orthopaedic Institute

***Professional Societies:***

American Academy of Orthopaedic Surgeons  
American Medical Association  
New York State Medical Society  
New York County Medical Society  
North American Spine Society  
American Back Society  
Diplomat American Board of Orthopaedic Surgery  
Scoliosis Research Society  
New York State Society of Orthopedists

***Major Research Interests:***

Clinical research in spinal deformity and  
degenerative conditions.

***Teaching Experience:***

1/87-5/89  
Mount Sinai Hospital  
Chief Spine Service, Orthopaedic Dept.  
Responsible for teaching orthopaedic house staff  
the management of spinal disorders and spinal  
surgery. Teaching responsibilities were clinical and  
didactic.  
  
1987-1990  
Booth Memorial Medical Center  
Responsible for teaching orthopaedic house staff.  
Included management of spinal deformity and  
spinal surgery. Teaching involved both clinical and  
didactic. Conducted clinic for orthopaedic spine  
patients.

**Paul Larry Kuflik, M.D.****Page 4**

1987-12/96 Hospital for Joint Diseases Orthopaedic Institute  
Responsible for teaching orthopaedic house staff  
and fellows, the management of spinal deformity  
and spinal surgery, Director of Scoliosis Clinic  
Teaching is both clinical and didactic.

12/96-Present Beth Israel Medical Center

**Principal Clinical and Hospital Service Responsibilities**

7/91-12/96 Hospital for Joint Diseases Orthopaedic Institute  
Chief Scoliosis Service

1993 Program Chairman  
Hospital for Joint Diseases Orthopaedic Institute  
Alumni Meeting

1994 President  
Hospital for Joint Diseases Orthopaedic Institute  
Alumni Association

**Presentations:**

Kuflik, P. Overview of Treatment of Spine Fractures. Mt. Sinai Trauma Conference, 6/88.

Reich J., Kuflik, P., Neuwirth M. Translaminar Facet Screw Fixation for Lumbar Arthrodesis. Nass, 1991.

Reich J., Kuflik, P., Neuwirth M. Translaminar Facet Screw Fixation for Lumbar Arthrodesis. AAOS, 1992. Poster Exhibit.

Jaffe, W., Kuflik, P., Gold, S.: Normalized and Proportionalized Femoral Stem Design: A Six Year Clinical Experience. Convention of the American Academy of Orthopaedic Surgeons, 1986.

Kuflik, P.: Moderator: Spine Section. H.J.D.O.I. Alumni Scientific Program 1992.

Giordano, C., Kuflik, P., Spivak, J., Neuwirth, M., Moskovich, R., Brisson, P. A Prospective Randomized Trial of Supplemental Peripheral Nutrition After One Stage Anterior and Posterior Spinal Reconstructive Surgery. Alumni Meeting, Hospital for Joint Diseases, October 29, 1993.

Remer, S., Marsicano, J., Neuwirth, M., Kuflik P., Bloom, N. Circumferential Fusion in the Adult Lumbar spine, Alumni Meeting, Hospital for Joint Diseases, October 29, 1993.

09/02/2005 12:04 2128448697

PAUL KUFLIK MD

PAGE 10

**Paul Larry Kuflik, M.D.****Page 5**

Margulies, J.Y., Floman, Y., Neuwlrth, M.G., Kuflik, P., Robin, G.C., Mirovsky, Y., Farcy, J.P., and Weidenbaum, M.: Correction of Spinal Deformities, and Algorithm for Selection of Instrumentation Levels and Degree of Curve Reduction. Scoliosis Research Society, Exhibit 18. Presented in Dublin Ireland, 1993.

Kuflik, P.: Moderator: Spine Section. H.J.D.O.I. Alumni Scientific Program, May 19, 1995.

Bendo, J., Neuwlrth, M., Spivak, J., Kuflik P., Bloom, M., Chung, P.: Circumferential Lumbar Fusion using Femoral Head Allograft for Anterior Interbody Fusion. Presented at Spine section for the Alumni Scientific Meeting, Hospital for Joint Diseases, New York, May 19, 1995.

Bendo, J., Neuwlrth, G., Spivak, J., Kuflik, P., Chung, P.: Fresh Frozen Femoral Head Allograft for Anterior Interbody Fusion Used in Circumferential Lumbar Fusions. Presented at American Academy of Orthopaedic Surgeons, 1996.

Bitan, F., Neuwlrth, M., Kuflik, P., Casden, A., Bloom, N., Siddiqui, S., Thomas, F.: The Use Of Solid Anterior Instrumentation In The Treatment Of Idiopathic Thoraco-Limbar Scoliosis. A Three-Year Follow-up Study. Presented at Scoliosis Research Society, 33rd Annual Meeting, 1998.

Kuflik, P.: Sagittal Plane Deformity In Scoliosis Surgery. GICD Meeting, New York Dec. 8-9, 2000.

P. Kuflik, A. Bender, R. Silvergleid.: Controversies in Back Injuries: A Multidisciplinary Panel Discussion. NYS Bar Association – 8/8/01.

Blecher HD, Bitan FD, Kahn SB, Lipp MI, Panagos A, Casden AM, kuflik PL, Neuwlrth MG. Correlation of Discogram Findings with Surgical Outcomes Following Total Disc Replacement, Spine Arthroplasty Society - Vienna -2004.

#### **Research and Publications:**

Kuflik, P.: The Effect of DMSO on Papain-Induced Arthritis In Rabbit Knee Joints (project). David G. Murray, M.D., supervisor. Upstate Medical Center, Syracuse, NY, 1980.

Kuflik, P., Ankolekar, A., Stuchin, S., and Bernstein, R.: Interscalene Brachial Plexus Block Anesthesia for Upper Extremity Surgery. Journal of Hand Surgery 11A(2):246-249.

Reich J., Kuflik, P., Neuwlrth M. Translaminar Facet Screw Fixation for Lumbar Arthrodesis. Spine, Vol. 18.3:1-6, 1993.

Margulies, J., Floman, Y., Robin, G., Neuwlrth, M., Kuflik, P., Weidenbaum, M., Farcy, J. An Algorithm for Selection of Instrumentation Levels In Scoliosis. Spine, Vol. 12.1: 165-175, 1998.



09/02/2005 12:04 2128448697

PAUL KUFLIK MD

PAGE 11

Paul Larry Kuflik, M.D.

Page 6

Cohen, J., Lee, K., Henry, G., Butusova, M., Slimbacker, A., Neuwirth, M., Kuflik, P., Casden, A., Bitan, F. Interoperative Arterial Artifact Associated with Somatosensory Evoked Potentials in Patients Undergoing Concomitant Transcranial Electrical Motor Evoked Potential Monitoring. American Journal of Electroneurodiagnostic Technology, 39:165-172, 1999.

Lee, K., Cohen, J., Neuwirth, M., Kuflik, P., Tucci, J., Henry, G. Intraoperative Monitoring of Transcranial Electrical Motor Evoked Potentials During Scoliosis Surgery. Abstract Presentation, American Clinical Neurophysiology Society Meeting, 1998.

Girasole GJ, Kuflik PL, Spivak JM: Pediatric spine:Spondylolisthesis. In: Spivak JM, DiCesare PE, Feldman DS, Koval KJ, Rokito AS, Zuckerman JD (eds): *Orthopaedics: A Study Guide*. New York: McGraw-Hill; 1999:419

Letko LJ, Kuflik PL: Adult spine: Deformity. In: Spivak JM, DiCesare PE, Feldman DS, Koval KJ, Rokito AS, Zuckerman JD (eds): *Orthopaedics: A Study Guide*. New York: McGraw-Hill; 1999:365.

Bitan, F., M.D., Neuwirth, M., M.D. Kuflik, P. M.D., Casden, A., M.D., Bloom, N., M.D., Siddiqui, S., M.D.. *The Use of Short and Rigid Anterior Instrumentation in the Treatment of Scoliosis. A retrospective review of 24 cases.* Spine, 2002; 27:1553-57.

# EXHIBIT C



Paul L. Kuflik, MD  
*Associate Professor*  
*Orthopaedic Spine Surgery*

*Mailing and Office Address*  
Icahn School of Medicine at Mount Sinai  
5 East 98<sup>th</sup> Street, 4<sup>th</sup> Floor, Box 1188  
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F 646-537-9449

Paul L. Kuflik, M.D.

Diplomat- American Board of Orthopaedic Surgery

List of Expert Witness & Testimony Appearances

August 2, 2010  
Giulio Lupo  
New York Supreme 2010 Personal Injury Plaintiff

October 25, 2010  
Klausner  
New York Supreme 2010 Personal Injury Plaintiff

July 2, 2012  
Cardinale VS DeMoura  
Nassau Supreme 2012 Med Mal Defense

October 1, 2013  
Michelle Brown  
Nassau Supreme 2013 Personal Injury Non Party Witness

January 28, 2014  
Marzec VS Garsh Gargage  
New York Supreme 2014 Personal Injury Defense

2014  
Montero  
Kings Supreme 2014 Personal Injury Defense

July, 2015  
Reynoso  
Kings Supreme 2015 Personal Injury Defense

March 3, 2016  
Gorman  
Richmond Supreme 2016 Personal Injury Defense

April 13, 2016  
Michelle Brown  
Queens Supreme 2016 Personal Injury Plaintiff

List of Testimony



Paul L. Kuflik, MD  
*Associate Professor*  
*Orthopaedic Spine Surgery*

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F 646-537-9449

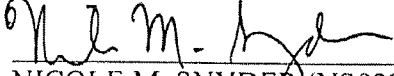
List of Testimony Continued.

May 13, 2016  
Gerrold VS DeMoura  
Suffolk Supreme 2016 Med Mal Defense

October 9, 2016  
Balaj VS Prismatic  
New York Supreme 2016 Personal Injury Defense

**CERTIFICATE OF SERVICE**

I hereby certify that affirmant served the within **Rule 26 Disclosures** by first class mail, postage prepaid this April 5, 2017 to all counsel of record as indicated on the service list below.

  
\_\_\_\_\_  
NICOLE M. SNYDER (NS0228)

**SERVICE LIST**

Mr. Howard R. Cohen  
William Schwitzer & Associates, P.C.  
820 2nd Avenue, 10th Floor  
New York, New York 10017

DOCKET NO.: 1:16-cv-02470-ILG-RML

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
ALICIA A. MCCALLA,

Plaintiff(s),

- against -

MS TRUCKING INC., DAVID JACKSON,

Defendants(s).

-----X

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**RULE 26 DISCLOSURES  
DEFENDANT'S EXPERT EXCHANGE**

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**SHAFFER GLAZER, LLP**  
Attorneys for Defendants  
MS Trucking, Inc. and David Jackson  
125 Maiden Lane, 16<sup>th</sup> Floor  
New York, New York 10038-3202  
(212) 267-0011  
File No.: 229-00205

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